

IN THE SUPERIOR COURT CARROLL COUNTY
STATE OF GEORGIA

RITA MEEKS, individually and as Administratrix)
of the Estate of ALAN HEMBREE,)

Plaintiff,)

vs.)

EULUS HOLBERT KEOWN, JR.,)
ROBERT LYNN NEWCOMB, CELADON)
TRUCKING SERVICES, INC., and WABASH)
NATIONAL CORPORATION,)

Defendants.)

CIVIL ACTION FILE
NO. 15CV01044

PLAINTIFFS' SUBPOENA DUCES TECUM AND NOTICE OF TAKING 30 (b) (6)
DEPOSITIONS

TO: Wabash National Corporation: The person(s) most knowledgeable about the following topics:

1. Design of the underride bar/guard utilized on the subject trailer;
2. Testing and failure analysis of the underride bar/guard as used on the subject trailer;
3. Claims, litigation and alleged failures of underride bars/guards with the same design as the subject trailer;
4. Claims, litigation and alleged failures of the welds of any underride bar/guard used by Wabash;
5. Alternative designs or changes to the design of underride bars/guards utilized by Wabash since the subject trailer was manufactured;
6. Inspections of the subject trailer's underride bar/guard at any time (before or after the collision);
7. Quality control efforts, inspections, protocols and policies pertaining to the assembly/construction of underride bars/guards at Wabash at the time the subject trailer was manufactured; and
8. Quality control efforts, inspections, protocols and policies pertaining to the adequacy of welds during the manufacturing/assembly phase of the underride bar/guards at Wabash including any changes in such efforts, inspections, policies or protocols from the date of the manufacture/assembly of the subject trailer to the present.

PLEASE TAKE NOTICE that pursuant to O.C.G.A. § 9-11-30, 9-11-34, and 9-11-45,

Plaintiffs in the above-captioned matter will take the deposition upon oral examination of the



Corporate Representative(s) referenced above beginning Wednesday, May 11, 2016 at 10:00 a.m.,
Wabash National Corporate Headquarters, 1000 Sagamore Parkway S, Lafayette, IN 47905,
before an officer duly authorized by law to administer oaths and take deposition testimony for the
purpose of discovery, for use in this action, or for such other purposes as are permitted by the
Georgia Civil Practice Act. The deposition will continue from day to day until its completion
including May 12, 2016, if necessary.

This witness shall bring with him the items listed in Exhibit "A" attached hereto.

You are invited to attend and examine the witness.

This 3rd day of May, 2016.

COOK LAW GROUP, LLC



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Jonathan Lee Greer
Greer Tisinger, LLC
210 South Street
Carrollton, GA 30117
jon@greertisingerlaw.com

Attorneys for Plaintiff

Exhibit "A"

1. All photos, memoranda, writings (electronic or otherwise) video, notes, inspection documents or any other tangible thing pertaining to any inspection of the underride bar/guard on the subject trailer at any time from the date of its manufacture to the present;
2. All documents, policies, videos or training materials regarding how the welding and assembly of the underride bar/guard should be performed on the type of underride bar/guard utilized on the subject trailer; and
3. All documents, policies, videos or training materials discussing how the welding and assembly of the underride bar/guard should be performed on the type of underride bar/guard utilized on the subject trailer.

IN THE SUPERIOR COURT CARROLL COUNTY
STATE OF GEORGIA

RITA MEEKS, individually and as Administratrix)	
of the Estate of ALAN HEMBREE,)	
)	
Plaintiff,)	
)	
vs.)	CIVIL ACTION FILE
)	NO. 15CV01044
)	
EULUS HOLBERT KEOWN, JR.,)	
ROBERT LYNN NEWCOMB, CELADON)	
TRUCKING SERVICES, INC., and WABASH)	
NATIONAL CORPORATION,)	
)	
Defendants.)	

CERTIFICATE OF SERVICE

The undersigned, attorney for Plaintiff in the above-styled case, hereby certifies that this day all parties have been served with a copy of the within and foregoing by STATUTORY ELECTRONIC SERVICE and/or United States Mail with proper postage affixed thereto and addressed as follows:

R. Christopher Harrison
Downey & Cleveland, LLP
harrison@downeycleveland.com
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Indianapolis, IN 46204
Attorneys for Defendant Wabash National Corporation

Dated this, the 3rd day of May, 2016.



Matthew E. Cook
Kate S. Cook

FILED IN OFFICE
CLERK OF SUPERIOR COURT
CARROLL COUNTY, GEORGIA
SUCV2015001044
J024
NOV 11, 2016 02:31 PM

Alan Lee, Clerk
Carroll County, Georgia

IN THE SUPERIOR COURT OF CARROLL COUNTY

STATE OF GEORGIA

RITA MEEKS, Individually, and
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Plaintiffs,

vs.

EULUS HOLBERT KEOWN, JR.,
ROBERT LYNN NEWCOMB,
CELADON TRUCKING SERVICES,
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CORPORATION,
Defendants.

CIVIL ACTION
FILE NO. 15CV01044

JUDGE: Kirby

PLAINTIFFS' SUBPOENA DUCES TECUM AND
NOTICE OF TAKING 30(b)(6) DEPOSITIONS

TO: Wabash National Corporation: The person(s) most knowledgeable about the following topics:

1. Design of the underride bar/guard utilized on the subject trailer;
2. Testing and failure analysis of the underride bar/guard as used on the subject trailer;
3. Claims, litigation and alleged failures of underride bars/guards with the same design as the subject trailer;
4. Claims, litigation and alleged failures of the welds of any underride bar/guard used by Wabash;
5. Alternative designs or changes to the design of underride bars/guards utilized by Wabash since the subject trailer was manufactured;
6. Inspections of the subject trailer's underride bar/guard at any time (before or after the collision);
7. Quality control efforts, inspections, protocols and policies pertaining to the assembly/construction of underride bars/guards at Wabash at the time the subject trailer was manufactured; and
8. Quality control efforts, inspections, protocols and policies pertaining to the adequacy of welds during the manufacturing/assembly phase of the underride bar/guards at Wabash including any changes in such efforts, inspections, policies or protocols from the date of the manufacture/assembly of the subject trailer to the present.

PLEASE TAKE NOTICE that pursuant to O.C.G.A. S 9-11-30, 9-11-34, and 9-11-45,

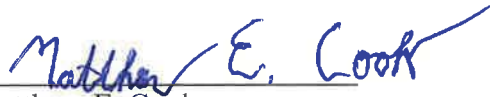
Plaintiffs in the above-captioned matter will take the deposition upon oral examination of the Corporate Representative(s) referenced above beginning Monday, November 21, 2016 at 8:30 a.m., Wabash National Corporate Headquarters, 1000 Sagamore Parkway S, Lafayette, IN 47905, before an officer duly authorized by law to administer oaths and take deposition testimony for the purpose of discovery, for use in this action, or for such other purposes as are permitted by the Georgia Civil Practice Act. The deposition will continue from day to day until its completion including November 22, 2016, if necessary.

This witness shall bring with him the items listed in Exhibit "A" attached hereto.

You are invited to attend and examine the witness.

This 10th day of November, 2016.

COOK LAW GROUP, P.C.



Matthew E. Cook

Georgia Bar No. 184399

Kate S. Cook

Georgia Bar No. 280584

(signed by Jon Greer with express permission)

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Gainesville, Georgia 30503
Telephone: (678) 928-3899
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(Signatures on following page)

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Carrollton, Georgia
(770) 836-8327
jon@greertisingerlaw.com

Attorneys for Plaintiffs

Exhibit "A"

1. All photos, memoranda, writings (electronic or otherwise) video, notes, inspection documents or any other tangible thing pertaining to any inspection of the underride bar/guard on the subject trailer at any time from the date of its manufacture to the present;
2. All documents, policies, videos or training materials regarding how the welding and assembly of the underride bar/guard should be performed on the type of underride bar/guard utilized on the subject trailer; and
3. All documents, policies, videos or training materials discussing how the welding and assembly of the underride bar/guard should be performed on the type of underride bar/guard utilized on the subject trailer.

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Defendants.

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**CIVIL ACTION
FILE NO. 15CV01044**

JUDGE: Kirby

CERTIFICATE OF SERVICE

The undersigned, attorney for Plaintiffs in the above-styled case, hereby certifies that this day all parties have been served with a copy of the within and foregoing by STATUTORY ELECTRONIC SERVICE and/or United States Mail with proper postage affixed thereto and addressed as follows:

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This the 10th day of November, 2016.

GREER TISINGER, LLC

By:



Jon Greer
Georgia State Bar No. 107106
Counsel for Plaintiff

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